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VIACOM

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Ex Parte***
In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems, ET Docket No. 98-153

Dear Ms. Dortch:

We are writing to urge the Commission, on reconsideration, to revise its emissions limits for UWB devices in the 3.7-4.2 GHz band to ensure that they will not interfere with satellite services.

Viacom owns several premium and basic cable program services and two broadcast networks that are delivered via C-band satellite capacity and received by cable operator headends and broadcast network affiliates throughout the United States using downlink antennas operating in the 3.7-4.2 GHz frequency range. Those program services include Showtime, Nickelodeon, MTV: Music Television, Noggin, TNN, CMT, VH1, and BET, and the broadcast networks CBS and UPN. Accordingly, Viacom and its cable and broadcast network affiliates literally have billions of dollars riding on the quality reception of C-band transmissions.

On June 17, 2002, the Satellite Industry Association (SIA) filed a petition for reconsideration addressing the Commission's First Report and Order in the above-referenced proceeding. SIA supplemented its petition with a technical study on January 10, 2003. SIA's petition and supplement demonstrate that the emissions limits the Commission has adopted for ultra-wideband devices are inadequate, and will expose satellite users to harmful interference in the downlink portion of the C-band, at 3.7-4.2 GHz. Viacom, therefore, supports the SIA petition.

Sincerely,



cc: Bruce Franca
Bryan Tramont
Jennifer Manner
Sam Feder